

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. <u>11-</u></b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: October 27, 2011</b>
<b>JANICE B. KING,</b>	<b>:</b>	<b>VIOLATIONS:</b>
a/k/a "J. Brenda Toney,"	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy - 1 count)</b>
a/k/a "J. Herman,"	<b>:</b>	<b>18 U.S.C. § 513(a) (passing counterfeit</b>
a/k/a "J. Evans,"	<b>:</b>	<b>checks - 4 counts)</b>
a/k/a "J. Brianna Gilliam,"	<b>:</b>	
a/k/a "J. Gilliam,"	<b>:</b>	
a/k/a "J. Benice Adams,"	<b>:</b>	
a/k/a "J. Adams,"	<b>:</b>	
a/k/a "Janice Freeman,"	<b>:</b>	
a/k/a "Janice Ali,"	<b>:</b>	
<b>SHEREA R. WILLIAMS,</b>	<b>:</b>	
a/k/a "Mrs. S. James,"	<b>:</b>	
a/k/a "S. James,"	<b>:</b>	
a/k/a "Sherea Austin,"	<b>:</b>	
a/k/a "S. Banks"	<b>:</b>	

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From in or about April 2005 to in or about January 2011, in Philadelphia and Glen Mills, in the Eastern District of Pennsylvania, and elsewhere, defendants

**JANICE B. KING,  
a/k/a "J. Brenda Toney,"  
a/k/a "J. Herman,"  
a/k/a "J. Evans,"  
a/k/a "J. Brianna Gilliam,"  
a/k/a "J. Gilliam,"  
a/k/a "J. Benice Adams,"  
a/k/a "J. Adams,"  
a/k/a "Janice Freeman,"  
a/k/a "Janice Ali"**

**and**  
**SHEREA R. WILLIAMS,**  
**a/k/a “Mrs. S. James,”**  
**a/k/a “S. James,”**  
**a/k/a “Sherea Austin,”**  
**a/k/a “S. Banks”**

conspired and agreed, with others known and unknown to the grand jury, to commit offenses against the United States, that is, to knowingly utter and possess a counterfeited security of an organization with intent to deceive another person or organization operating in and affecting interstate commerce, in violation of Title 18, United States Code, Section 513(a).

### **MANNER AND MEANS**

It was part of the conspiracy that:

2. Defendants JANICE B. KING and SHEREA R. WILLIAMS used false names and addresses to fraudulently open bank accounts and obtain checkbooks for those accounts.
3. Defendants JANICE B. KING and SHEREA R. WILLIAMS passed checks with these false names and false addresses to make purchases at Target and other retail stores in Pennsylvania, Delaware, New Jersey, New York, and other states on the East Coast.
4. Defendants JANICE B. KING and SHEREA R. WILLIAMS often passed checks with partially obscured account numbers so as to delay confirmation from banks of the fraudulent nature of the bank accounts and checks.
5. Through their passing of checks with false names and addresses, defendants JANICE B. KING and SHEREA R. WILLIAMS defrauded Target and other retail stores of over \$250,000.

### **OVERT ACTS**

In furtherance of the conspiracy, defendants JANICE B. KING and SHEREA R. WILLIAMS, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. From in or about April 2005 to in or about January 2011, defendants JANICE B. KING and SHEREA R. WILLIAMS used false names and addresses to open bank accounts and obtain checkbooks at PNC Bank, Sovereign Bank, City National Bank, and Wachovia/Wells Fargo Bank.

2. On or about April 20, 2005, defendant JANICE B. KING passed a check, dated April 20, 2005, in the false name of “Janice Freeman” with a false address of “237 Parkview Terrace, Hillside, New Jersey,” drawn on Wachovia Bank, check number 4589, in the amount of \$227.85 at a Target store in Englishtown, New Jersey.

3. On or about March 25, 2006, defendant JANICE B. KING passed a check, dated March 25, 2006, in the false name of “Janice Ali” with a false address of 854 Summit Avenue, Union City, New Jersey,” drawn on Wachovia Bank, check number 5237, in the amount of \$339.04 at a Target store in Kearny, New Jersey.

4. On or about March 4, 2007, defendant JANICE B. KING passed a check, dated March 4, 2007, in the false name of “Janice Freeman” with a false address of “185 Avon Drive, Newark, New Jersey,” drawn on Wachovia Bank, check number 3019, in the amount of \$40.00 at a Target store in Fairfield, New Jersey.

5. On or about May 27, 2007, defendant JANICE B. KING passed a check, dated May 27, 2007, in the false name of “J. Gilliam” with a false address of “471 Speedwell Avenue, Morristown, New Jersey,” drawn on Wachovia Bank, check number 8236, in the

amount of \$67.79 at a Target store in Florence, South Carolina.

6. On or about September 26, 2007, defendant JANICE B. KING passed a check, dated September 26, 2007, in the false name of “J. Brianna Gilliam” with a false address of “471 Speedwell Avenue, Stirling, New Jersey,” drawn on Wachovia Bank, check number 8981, in the amount of \$75.89 at a Target store in Clark, New Jersey.

7. On or about April 26, 2008, defendant JANICE B. KING passed a check, dated April 26, 2008, in the false name of “J. Evans” with a false address of “50 Bedford Terrace, Irvington, New Jersey,” drawn on PNC Bank, check number 7874, in the amount of \$121.27 at a Target store in Watchung, New Jersey.

8. On or about September 23, 2009, defendant SHEREA R. WILLIAMS passed a check, dated September 23, 2009, in the false name of “Sherea Austin” with a false address of “252 S. 10<sup>th</sup> Street, Newark, New Jersey,” drawn on PNC Bank, check number 6247, in the amount of \$120.00 at a Target store in Rockaway, New Jersey.

9. On or about October 10, 2009, defendant JANICE B. KING passed a check, dated October 10, 2009, in the false name of “J. Bernice Adams” with a false address of “512 Union Avenue A4, Irvington, New Jersey,” drawn on PNC Bank, check number 5416, in the amount of \$115.00 at a Target store in Mount Laurel, New Jersey.

10. On or about December 14, 2009, defendant JANICE B. KING passed a check, dated December 14, 2009, in the false name of “J. Adams” with a false address of “512 Union Avenue A4, Irvington, New Jersey,” drawn on PNC Bank, check number 5096, in the amount of \$125.98 at a Target store in Edison, New Jersey.

11. On or about January 4, 2010, defendant SHEREA R. WILLIAMS passed a

check, dated January 4, 2010, in the false name of “Sherea Austin” with a false address of “252 S. 10<sup>th</sup> Street, Newark, New Jersey,” drawn on PNC Bank, check number 6310, in the amount of \$122.00 at a Target store in Watchung, New Jersey.

12. On or about February 9, 2010, defendant SHEREA R. WILLIAMS passed a check, dated February 9, 2010, in the false name of “Sherea Austin” with a false address of “252 S. 10<sup>th</sup> Street, Newark, New Jersey,” drawn on PNC Bank, check number 6051, in the amount of \$100.00 at a Target store in Philadelphia, Pennsylvania.

13. On or about February 22, 2010, defendant JANICE B. KING passed a check, dated February 22, 2010, in the false name of “J. Bernice Adams” with a false address of “512 Union Avenue A4, Irvington, New Jersey,” drawn on PNC Bank, check number 5222, in the amount of \$100.00 at a Target store in Colonial Heights, Virginia.

14. On or about May 16, 2010, defendant JANICE B. KING passed a check, dated May 16, 2010, in the false name of “Mrs. J. Evans” with a false address of 50 Bedford Terrace, Irvington, New Jersey,” drawn on PNC Bank, check number 7618, in the amount of \$100.00 at a Target store in Glen Mills, Pennsylvania.

15. On or about June 25, 2010, defendant SHEREA R. WILLIAMS passed a check, dated June 25, 2010, in the false name of “S. Banks” with a false address of “10 N. Wood Avenue, Apt. 404, Linden, New Jersey,” drawn on PNC Bank, check number 9235, in the amount of \$130.00 at a Target store in Cherry Hill, New Jersey.

16. On or about July 17, 2010, defendant JANICE B. KING passed a check, dated July 17, 2010, in the false name of “J. Herman” with a false address of “150 Prospect Avenue, Asbury Park, New Jersey,” drawn on Wachovia Bank, check number 7191, in the

amount of \$100.00 at a Target store in Bronx, New York.

17. On or about October 3, 2010, defendant JANICE B. KING passed a check, dated October 3, 2010, in the false name of “J. Herman” with a false address of “150 Prospect Avenue, Asbury Park, New Jersey,” drawn on Wachovia Bank, check number 7090, in the amount of \$95.99 at a Target store in Philadelphia, Pennsylvania.

18. On or about November 26, 2010, defendant JANICE B. KING passed a check, dated November 26, 2010, in the false name of “J. Herman” with a false address of “150 Prospect Avenue, Asbury Park, New Jersey,” drawn on Wachovia Bank, check number 7515, in the amount of \$40.00 at a Target store in Cherry Hill, New Jersey.

19. On or about December 22, 2010, defendant SHEREA R. WILLIAMS passed a check, dated December 22, 2010, in the false name of “S. James” with a false address of “33 Meadowbrook Road, Maplewood, New Jersey,” drawn on Wachovia Bank, check number 4143, in the amount of \$127.28 at a Target store in Philadelphia, Pennsylvania.

20. On or about January 30, 2011, defendant JANICE B. KING passed a check, dated January 30, 2011, in the false name of “J. Brenda Toney” with a false address of “229 Willow Avenue, North Plainfield, New Jersey,” drawn on Sovereign Bank, check number 7012, in the amount of \$127.99 at a Target store in Cherry Hill, New Jersey.

21. On or about January 30, 2011, defendant SHEREA R. WILLIAMS passed a check, dated January 30, 2011, in the false name of “Mrs. S. James” with a false address of “33 Meadowbrook Road, Maplewood, New Jersey,” drawn on Wachovia Bank, check number 4181, in the amount of \$127.68 at a Target store in Cherry Hill, New Jersey.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 16, 2010, in Glen Mills, in the Eastern District of Pennsylvania,  
defendant

**JANICE B. KING,  
a/k/a “J. Brenda Toney,”  
a/k/a “J. Herman,”  
a/k/a “J. Evans,”  
a/k/a “J. Brianna Gilliam,”  
a/k/a “J. Gilliam,”  
a/k/a “J. Benice Adams,”  
a/k/a “J. Adams,”  
a/k/a “Janice Freeman,”  
a/k/a “Janice Ali,”**

with intent to deceive an organization operating in and affecting interstate commerce, that is,  
Target, knowingly uttered and possessed, and aided and abetted the uttering and possession of, a  
counterfeited security drawn on PNC Bank, an organization operating in and affecting interstate  
commerce, that is, a counterfeited check of a person named “Mrs. J. Evans,” with an address of  
“50 Bedford Terrace, Irvington, New Jersey,” dated May 16, 2010, check number 7618, in the  
amount of \$100.00.

All in violation of Title 18, United States Code, Section 513(a).



**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 3, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JANICE B. KING,  
a/k/a “J. Brenda Toney,”  
a/k/a “J. Herman,”  
a/k/a “J. Evans,”  
a/k/a “J. Brianna Gilliam,”  
a/k/a “J. Gilliam,”  
a/k/a “J. Benice Adams,”  
a/k/a “J. Adams,”  
a/k/a “Janice Freeman,”  
a/k/a “Janice Ali,”**

with intent to deceive an organization operating in and affecting interstate commerce, that is, Target, knowingly uttered and possessed, and aided and abetted the uttering and possession of, a counterfeited security drawn on Wachovia Bank, an organization operating in and affecting interstate commerce, that is, a counterfeited check of a person named “J. Herman,” with an address of “150 Prospect Avenue, Asbury Park, New Jersey,” dated October 3, 2010, check number 7090, in the amount of \$95.99.

All in violation of Title 18, United States Code, Section 513(a).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 9, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**SHEREA R. WILLIAMS,  
a/k/a “Mrs. S. James,”  
a/k/a “S. James,”  
a/k/a “Sherea Austin,”  
a/k/a “S. Banks,”**

with intent to deceive an organization operating in and affecting interstate commerce, that is, Target, knowingly uttered and possessed, and aided and abetted the uttering and possession of, a counterfeited security drawn on PNC Bank, an organization operating in and affecting interstate commerce, that is, a counterfeited check of a person named “Sherea Austin,” with an address of “252 S. 10<sup>th</sup> Street, Newark, New Jersey,” dated February 9, 2010, check number 6051, in the amount of \$100.00.

All in violation of Title 18, United States Code, Section 513(a).

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 22, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**SHEREA R. WILLIAMS,  
a/k/a “Mrs. S. James,”  
a/k/a “S. James,”  
a/k/a “Sherea Austin,”  
a/k/a “S. Banks,”**

with intent to deceive an organization operating in and affecting interstate commerce, that is, Target, knowingly uttered and possessed, and aided and abetted the uttering and possession of, a counterfeited security drawn on Wachovia Bank, an organization operating in and affecting interstate commerce, that is, a counterfeited check of a person named “S. James,” with an address of “33 Meadowbrook Road, Maplewood, New Jersey,” dated December 22, 2010, check number 4143, in the amount of \$127.28.

**A TRUE BILL:**

**GRAND JURY FOREPERSON**

**ZANE DAVID MEMEGER  
United States Attorney**